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*Attorneys for Plaintiff*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

8 DAICHENA THOMAS, individually and as the  
9 personal representative of Estate of Palmer  
10 Pearce Joseph Wright; DANA THOMAS,  
11 individually; DEVONTAY THOMAS,  
12 individually; DELON ARMSTRONG,  
individually; J. W., individually; and  
GERMAINE CARMENA, individually,

15 CLARK COUNTY; LAS VEGAS  
16 METROPOLITAN POLICE DEPARTMENT;  
17 CLARK COUNTY DETENTION CENTER;  
18 WELLPATH, LLC; CORRECT CARE  
19 SOLUTIONS, LLC; J. MARCOS, RN; EARL  
D. SALVIEJO, NP; TANJA WASIELEWSKI,  
RN; LARS WILLIAMS, RN; H. HANNASH,  
RN; DAVID OLIPHANT, PA; LPN ALEXIA;  
BECKY S. CHRISTENSE, RN; RAY  
MARTIN MONTENEGRO, NP; KATE  
PURCELL, RN; DOES I through C, inclusive,  
and ROE CORPORATIONS I through II,  
inclusive,

Defendants.

CASE NO.: 2:22-cv-0899-GMN-NJK

**STIPULATION AND ORDER TO  
EXTEND THE TIME TO FILE JOINT  
STATUS REPORT**

25           **IT IS HEREBY STIPULATED AND AGREED** by and between the parties, through  
26 their respective counsel that the parties' deadline to file a joint status report, ordered by the court  
27 on May 30, 2025 (Doc. No. 144), should be extended from June 13, 2025 to June 27, 2025 and

1 the parties request that the court order the extension. The request for an extension is made by the  
 2 plaintiffs and is made for the following two reasons presented by plaintiffs' counsel:

3       1. Plaintiff's counsel was out of the country from May 29, 2025 to June 11, 2025 as  
 4 a result of a family health issue, which delayed preparation of the joint status report; and

5       2. At the April 22, 2025 hearing on the plaintiffs' motion to lift stay in Wellpath  
 6 defendants' bankruptcy case in the United States Bankruptcy Court for the Southern District of  
 7 Texas, Houston Division, the bankruptcy judge ordered, *inter alia*, that the bankruptcy stay be  
 8 immediately lifted as to the non-Wellpath-related defendants in this case. However, the written  
 9 order granting the motion has not been entered by the court. Upon plaintiffs' counsel's return to  
 10 the office on June 12, 2025, plaintiffs' counsel emailed the plaintiffs' bankruptcy counsel in  
 11 Houston, Texas requesting status of the order but has not yet received a response. Plaintiffs'  
 12 counsel submits that the requested extension of time will provide additional time for bankruptcy  
 13 counsel to respond to the recent inquiry and to cause the entry of the order lifting stay, which, of  
 14 course, will result in a more substantive joint status report to this court.

15       The parties agree that the above facts present good cause for the requested extension of  
 16 time and they jointly request that the court grant the extension.

17 DATED this 12<sup>th</sup> day of June 2025.

18 STOVALL & ASSOCIATES

19       */s/ Ross Moynihan*

20       \_\_\_\_\_  
 21 ROSS MOYNIHAN, ESQ.  
 22 Nevada Bar No. 11848  
 23 2301 Palomino Lane  
 24 Las Vegas, Nevada 89107  
 25 *Attorney for Plaintiffs*

26 DATED this 12<sup>th</sup> day of June 2025.

27 LEWIS BRISBOIS BISGAARD & SMITH  
 28 LLP

29       */s/ Shannon Kalllin*

30       \_\_\_\_\_  
 31 BRENT VOGEL, ESQ.  
 32 Nevada Bar No. 6858  
 33 SHANNON KALLIN, ESQ.  
 34 Nevada Bar No 16555  
 35 6385 S. Rainbow Blvd., Ste. 600  
 36 Las Vegas, NV 89118  
 37 *Attorney for Defendants Wellpath, LLC*

1 DATED this 12<sup>th</sup> day of June 2025.

2 KAEMPFER CROWELL

3 /s/ *Lyssa Anderson*

4 LYSSA S. ANDERSON, ESQ.

5 Nevada Bar No. 5781

6 1980 Festival Plaza Drive, Suite 650

7 Las Vegas, NV 89135

8 Attorney for Defendant

9 Las Vegas Metropolitan Police Department

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**ORDER**

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Based upon the above stipulation of the parties and for good cause appearing, it is hereby  
ORDERED that the parties' deadline to file a joint status report, shall be extended from June 13,  
2025 to June 27, 2025.

  
DISTRICT COURT JUDGE